

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

IN RE GERBER PRODUCTS COMPANY :	Master File No. 1:21-cv-00269
HEAVY METALS BABY FOOD :	
LITIGATION :	Class Action
:	
THIS DOCUMENT RELATES TO :	
ALL ACTIONS :	
:	

JOINT AGENDA FOR AUGUST 19, 2022 STATUS CONFERENCE

Pursuant to the Rule 16(b) Scheduling Order (ECF No. 131), at ¶ 9, Plaintiffs Deandra Bryant, Christopher Craig, Mayra Verduzco, Renee Bryan, Jennifer Gaetan, Vanessa Inoa, Charlotte Willoughby, Angelique Velez, Danielle Visconti, Jessica Moore, and Janice Wilson (“Plaintiffs”) and Defendant Gerber Products Company (“Defendant” or “Gerber”) (together, the “Parties”), hereby submit this Joint Agenda for the August 19, 2022 Status Conference. The Parties propose the following agenda items:

1. Outstanding discovery issues: The parties have agreed to the deadline of September 9, 2022, for Gerber to substantially complete its production of responsive documents for priority custodians. The parties continue to meet and confer regarding the custodians that have been identified as non-priority and regarding Plaintiffs’ 30b6 deposition notice. If the parties reach an agreement before the August 19, 2022 status conference, they will advise the Court that the status conference should be adjourned.
2. The September 9, 2022 status conference: The parties propose that the Court continue the September 9, 2022 status conference to September 16, 2022, the date of the hearing on Gerber’s motion to dismiss.

The parties plan on attending the August 19, 2022 conference in person.

Dated: August 12, 2022

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Dated: August 12, 2022

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